

her there so she wouldn't be identified. I talked every day with her to see what she thought. She did not at any time want to do things differently so that people wouldn't know. The school counselors talked with all the girls in small groups so that if she skipped the talk no one would be able to tell if she was missing. I know pressure was put on several girls in the beginning who fit the identifying criteria for the victim. Some missed school & practice because they were so upset about being accused. Through it all, my daughter kept up a brave face & front to the outside. She did become very anxious though & wanted me to be near her at all times. I play in the bell choir at my church & had to sit out a season because we practiced on the same night as her softball practice & she needed me to stay with her the whole time.

Due to her missing time at school for dr. appt, police visits, NOVA, etc- she fell behind in the first semester. A few of her teachers allowed her to make up her missing tests, etc. but not all. None of them were told why she wasn't there. I met with the principal, athletic director, school superintendent, & their HR person. We were able to come to an understanding about how they would give her extra time to catch up, without penalty, if needed. She is also a National Honor Society member. I was afraid she was in danger if this came out, of being kicked out for impropriety. I was given assurance that it wouldn't happen. All of this caused much stress & anxiety to me. I was also able to get a school issued lap top for her to do her homework on. Some of her class assignments had to be done & turned in via the internet. She could not do these as all of our electronics were taken away as evidence. They have still not been returned. Our home computer, ipad, & my

daughter's broken & new iphone, were all confiscated. My hope is that when sentencing is over, we will get them all back. In the mean time we were left without anything to use ( neither my husband nor I have iphones ). Due to my trust issues, I would not do my banking on anyone else's computer ( not even a family member ). We did not have the money to go buy a new computer or new iphone for our daughter. We are now borrowing a refurbished lap top cleaned off & set up by a computer friend. Our daughter has a go phone to use ( but it is a smart phone ).

My parents, who are in their mid to late 70's, were out of state on vacation when this all went down. They missed the news of the arrest on tv & in the papers. I did not want them to have to hear the news over the phone & have to drive hundreds of miles home at the end of their week. So I waited to go see them in person. My daughter was adamant that I not tell them at all, but that wasn't an option of course. They came home early & talked with my 96 yr. old Aunt in NJ who had seen the news & knew it was our team before I could get to them. I avoided answering their calls until I could drive over to them. Of course this only added to their misery & heartache of not knowing for those few hours. I sat down with them & we talked for hours. They of course were told not to talk with anyone or confirm even with their friends the truth. I am sure many could figure it out on their own but so be it. I give them credit for handling it well, although my Father looked very ill for weeks, so I worried about him too.

My husband's parents are in their mid 80's. They missed the news until his bail hearing ( at which I spoke ). They then realized it was our team & immediately called to ask how our daughter was

& to make sure it wasn't her. My husband was unable to answer right away, so they knew then. They also have handled it well I believe. They are more worried for our daughter & my husband & I than themselves. They see what it has done to us & has cost us in time, money & even sanity.

My sister & her husband have 2 boys who are 3 & 6 yrs old. I babysat for them at least once a week. Since this has happened they have not asked me to babysit them. I believe they are too worried about adding more stress to my life & think I can't handle anymore. I try not to let anyone know how close I am to falling apart but I think they realize it.

I do not want this man to ever come near my daughter or us again. I do not have any real hope that he can be rehabilitated since this was not his first victim, nor do I think it will be his last. One of the only things that helped my daughter start healing, was when we learned there were other girls just like herself. Sad set of circumstances, but it helped her get through losing her view of being "special" to him.

From the beginning, I did not ask why her or us. Although I have not forgiven him, I am at peace with God. My firm belief is that God chose our daughter to go through this because she was strong enough to handle it. She could stop him & hopefully put an end to this, when the other girls couldn't or wouldn't. I stand firm in my belief. I pray that no other girl or parent has to go through this again because of him. I know he has been able to "resign" from other schools/churches when he was found out before. I know he & his wife have been to counseling due to his behavior. None of this has stopped him. He just goes & continues at a different school

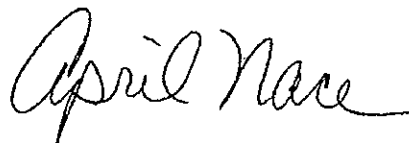
to do the same thing. He coaches these young, impressionable girls & gains their trust over a period of time. He thinks he knows the laws & how not to get caught or be in trouble. All the while deceiving the girl, her parents, other players, other coaches, his own wife, & his own children. He has thrown away his family, job, & friends, all to satisfy his sick, twisted, sexual urges.

On a positive note- my husband & I have become closer to each other through this. We are proud of our daughter for being courageous & doing what's right. She has put her life back on track by focusing on school, choosing a college & playing softball there. This has always been her lifelong dream to play in college. He had brainwashed her to not play in college & to only play on whatever team he coached. Thankfully she has moved on. She is looking to pursue a career in the criminal justice field & crime scene forensics.

I am anxious about the upcoming sentencing & what will happen to him. I feel I have no control over any of it or anything else for that matter. It's very hard for me. I hope when this is resolved, I can find my way back on track again. Please see past his "charming" façade to the actual devious manipulator he is. Please use all of your resources to sentence him to the maximum possible in a secure state prison. Please give justice to our family & the other families whom he victimized prior to us.

Thank you for taking the time to listen & read this.

Sincerely from my heart,

A handwritten signature in cursive script that reads "April Nace". The signature is written in dark ink and is positioned below the typed name.

Brian A. Pelloni \*♦†  
 Blair Leah Hornstine \*‡  
 John A. Richert \*¥  
 Patrick D. Quarles \*  
 Maria C. Janoski \*♦  
 David J. Groth \*□  
 Richard L. Vanderslice \*♦△□  
 Kevin A. Carreno \*°□  
 David Louis Cohen □

# HORNSTINE PELLONI & HORNSTINE

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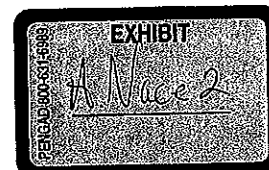
October 1, 2015

♦ Licensed in NJ  
 § Licensed in NY  
 \* Licensed in FL  
 ° Licensed in CO  
 △ Licensed in CA  
 ‡ PA Managing Attorney  
 † NJ Managing Attorney  
 ¥ FL Managing Attorney  
 □ Of Counsel

VIA EXPRESS MAIL

Kelly M. Haines  
 1727 Weidner Court  
 Quakertown, Pa. 18951

**RE: Nace v. Pennridge High School, et al.**



Dear Mrs. Haines:

I just received letters from your husband and pastor requesting that I release you from your subpoenaed deposition on October 8, 2015 at 10:00 AM for reasons of personal health and emotional welfare. For a number of reasons, I cannot and will not agree to that request. First, I am ethically obligated as an attorney to vigorously pursue my client's claims in accordance with applicable Federal Rules of Civil Procedure to the best of my ability. Since I believe that you have information that may be factually important, relevant and even significant in connection with my client's claims, especially against the Faith Christian Academy (FCA) defendants, I cannot simply ignore that potential evidence to the detriment of my own client.

Secondly, I sent you a letter on August 20, 2015 asking you to voluntarily contact me to discuss your own situation at FCA in the 1990s, but you failed to do so. I even gave you my cell phone number, in an attempt to have an informal conversation with you to discuss the information I am looking for, and informed you that if you did not respond to my letter, I would have no alternative but to subpoena and compel your testimony under oath in my case. Again, you failed to respond to my letter, forcing me to schedule your impending deposition.

Thirdly, although your husband and pastor indicate that you should not be compelled to testify due to personal health and emotional welfare issues, I cannot help but to wonder why those same issues do not prevent you from using the internet and social media, including Twitter and your "Marriage, Mommy and Myself" blog, to discuss your own personal history, including "...child sexual abuse, PTSD, depression, anxiety and insecurity ...." You even talk about using your own experience to "...speak to youth and make my life struggles a means of helping others ...", using a heading "Life Hurts ....Fight Hard!"

You know that my client is going through the same type of struggles right now, only two years removed from her sexual abuse at the hands of your brother, Eric Romig. He has already accepted some accountability for my client's suffering by pleading guilty to 6 felony counts which has resulted in his incarceration for at least 3 to 7 years in state prison. On the other hand, it is our position that the FCA defendants still have not been held accountable in any way, and continue to deny any responsibility for my client's sexual abuse at the hands of their former employee, Eric Romig. One would think, based upon your own personal history at FCA, and

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 P: 609-523-2222

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issues addressed in your blog and tweets, that you would want any facts and information from your own situation at FCA in the mid 1990s to be made known to the extent that they are relevant and important to the legal issues raised by my client's own claims.

I am happy to discuss this issue directly with you over the telephone or by a personal meeting at a location of your own choosing. However, I will not agree to forego your deposition next Thursday. If you do not attend that deposition, I will have no alternative but to seek a court order to complete the deposition, and impose any additional sanction the court deems appropriate.

Finally, I do not know if you have already discussed this issue with any representatives of FCA, including their counsel, and you are certainly free to discuss anything you want with anyone at any time. However, you should understand that any communication that you or your representatives have with FCA or its representatives is information that I will ask you about during your deposition when it is taken and you will have to answer those questions. Although I certainly understand why you would prefer not to have to discuss under oath the circumstances of your own sexual abuse while attending FCA over 19 years ago, my client likewise did not want to discuss her sexual abuse from only 2 years ago with 5 attorneys from FCA and Pennridge School District. But her deposition was conducted by those attorneys and I am obligated to complete yours, as well. I can assure you that I will do so in as respectful and professional a manner as is possible.

Again, if you would like to directly discuss this issue further, please call me at 267-231-2170 at your convenience.

Thanking you for your attention in this matter, I am

Very truly yours,  
Hornstine Pelloni & Hornstine, LLC



David J. Groth, Esquire



4/11/16

George J. Haines  
1727 Weidner Court  
Quakertown, PA 18951

September 25, 2015

David J. Groth, Esquire  
Hornstine, Pelloni & Hornstine  
1500 Walnut Street, Suite 300  
Philadelphia, PA 19102

RE: Nace vs. Pennridge School District, et al.

Dear Mr. Groth:

My wife, Kelly M. Haines, is in receipt of your letter and subpoena for a deposition on October 8, 2015. Please allow this letter to notify you that my wife is unable to attend this deposition, due to reasons of personal health and emotional welfare.

Kelly is currently not in counseling and is doing pretty well. She is working full time and is an active mother to our three children. However, both her pastor/counselor and I believe that it would be extremely detrimental to her health and wellbeing for her to have to relive the events of 20 years ago. Once your questions have caused the feelings and issues of the past to resurface, who will be there to help us cope with the aftereffects? We have reached a point in our lives where we have been able to move forward and Kelly has worked hard to get to the emotional and mental state where she is now. Quite frankly, our family may not be able to pick up the pieces after you are finished with whatever it is that you hope to accomplish with your deposition.

I am attaching a copy of a letter from her pastor/counselor for over three years and am respectfully asking that you appreciate our position.

Thank you, Mr. Groth, for your anticipated understanding.

Sincerely,



George J. Haines



**ROYERSFORD  
BIBLE FELLOWSHIP**  
CONNECTING YOU TO WHAT MATTERS MOST

September 25<sup>th</sup>, 2015

To whom it may concern:

I would like to introduce myself to you. I am Rev. Andrew T. Gysi. Currently I am the Sr. Pastor at Royersford Bible Fellowship located in Royersford, PA. My previous ministry was from 1999--2012 at East Swamp Church in Quakertown, where my role was the Associate Pastor overseeing administration, discipleship and counselling. My credentials are as follows:

- Bachelor of Science in Bible with my major in Bible and a minor in Pastoral Studies -- 1991
- Master of Science in Bible with my major in Bible and a minor in counseling (graduating Summa Cum Laude) -- 2005
- I hold two ordinations:
  - Ordained into the Gospel Ministry at Faith Community Church, Roslyn, PA in 1996
  - Ordained into Bible Fellowship Church denomination in 2014
- I have over 25 years of Pastoral ministry experience.

I share this with you so you know a little background about me.

Pertaining to Kelly Haines, I want you to know that my wife and I have done extensive Pastoral Counseling with Kelly for over three years beginning in 2009, and this Pastoral Counseling was much needed at that time.

Through that counseling time and beyond, we saw some amazing progress in Kelly to the point that there is no need for continued counseling, and this is because she is mentally and emotionally in a very good place now.

I understand that Kelly is being called to give a deposition about her past. Personally, and professionally I believe that it would be extremely detrimental to Kelly's health and welfare to recall, process and speak again about her past.

Thank you for your consideration in releasing Kelly from this deposition so that she can continue, as she has in the last few years, to be an excellent wife and mom of three children.

Sincerely,

Rev. Andrew T. Gysi

Sr. Pastor, Royersford Bible Fellowship



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